

April 27, 2023

**BY ECF**

Honorable Eric R. Komitee  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom: 6G North  
Brooklyn, New York 11201

**Re: *Edmondson, et al. v. Raniere et al.*, 1:20-CV-00485-EK-CLP**

Dear Judge Komitee:

We represent Defendant Clare Bronfman in the above-referenced matter and submit this letter in response to Plaintiffs' Motion for Leave to File an Amended Complaint ("Plaintiffs' Motion"). Dkt. 202. We hereby inform the Court that Ms. Clare Bronfman does not intend to oppose Plaintiffs' Motion, however, does intend to file a motion to dismiss under the Federal Rules of Civil Procedure, and requests that the Court adopt a briefing schedule and page limits for her to file a motion to dismiss.

Ms. Clare Bronfman and her counsel of record, including the undersigned, have reviewed the proposed Third Amended Complaint ("TAC"). Counsel has consulted with Ms. Clare Bronfman, who is currently incarcerated and was recently moved by the Bureau of Prisons without notice to counsel.

Ms. Clare Bronfman and her counsel of record believe that the most efficient way to address the TAC is not to oppose leave to file the TAC, but to file a motion to dismiss under the Federal Rules of Civil Procedure. Accordingly, upon the Court's grant of Plaintiffs' Motion for Leave and subsequent filing of the TAC, Ms. Clare Bronfman requests that the Court adopt the proposed motion to dismiss briefing schedule and page limits:

- July 1, 2023: Deadline for Ms. Clare Bronfman to move to dismiss (page limit 50 pages)
- August 1, 2023: Deadline for Plaintiffs to respond to Ms. Clare Bronfman's motion to dismiss (page limit 50 pages)
- September 1: Deadline for Ms. Clare Bronfman to file a reply to Plaintiffs' response to Ms. Clare Bronfman's motion to dismiss (page limit 25 pages)

Accordingly, Ms. C. Bronfman respectfully requests that the Court accept the TAC as the operative complaint and adopt the proposed motion to dismiss briefing schedule for Ms. Clare Bronfman.

Counsel for Ms. Clare Bronfman, upon reviewing Your Honor's procedures, concluded that this letter was an appropriate manner in which to advise the Court of Ms. Clare Bronfman's position. If the Court prefers, however, Ms. Clare Bronfman will file a formal pleading to this effect.

Respectfully,

WILLKIE FARR & GALLAGHER LLP

/s/ Craig C. Martin

Craig C. Martin

cc: All Counsel and Pro Se Defendants by ECF